

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Crim. No. 22-
	:	
JOHN DOE	:	<u>AFFIDAVIT IN SUPPORT OF</u>
	:	<u>MOTION TO SEAL/RENAME</u>
	:	
	:	To Be Filed Under Seal

I, Task Force Officer Matthew Herbert, being duly sworn, depose and state:

1. I am a Task Force Officer with the U.S. Drug Enforcement Administration (“DEA”). I have experience with narcotics trafficking investigations, including the execution of warrants and orders for cellphone location data. I am a member of the team of law enforcement agents working on the investigation that is described herein. During my career, I have participated in numerous investigations of federal crimes, including unlawful drug trafficking and money laundering, and have, among other things, conducted or participated in surveillance, the interception of wire communications, the execution of search warrants, debriefings of informants, and reviews of taped conversations and drug records. I have been trained in various aspects of law enforcement, particularly the investigation of narcotics and money laundering offenses. I am familiar with the manner and means in which controlled substances are used, possessed, packaged, and distributed. In addition, I am familiar with the manner and means in which narcotics proceeds are collected, processed, transported, and laundered. Investigations in which I have been involved have resulted in

numerous arrests and convictions, as well as seizures of narcotics and narcotics proceeds.

2. In the course of my duties as a Task Force Officer with the DEA, I have become familiar with the instant matter. In particular, the defendant, referred to herein as “John Doe”, [REDACTED], which could place him in danger if the case is not docketed as U.S. v. John Doe and the docket entries for [REDACTED]

[REDACTED]. Additionally, the Government’s ongoing investigation may be jeopardized if John Doe’s [REDACTED]
[REDACTED].

3. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED] Law enforcement has determined that in addition to narcotics distribution, which is in and of itself often a violent endeavor, the [REDACTED] utilizes violence. [REDACTED]

[REDACTED] Thus, law enforcement is concerned that if other members and associates of [REDACTED] learn of [REDACTED] [REDACTED] John Doe's and John Doe's family's safety could be at risk.

5. At this time, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8.

[REDACTED]

[REDACTED]

[REDACTED]

9.

[REDACTED]

[REDACTED]

Matthew Herbert

Matthew Herbert
Task Force Officer
Drug Enforcement Administration